

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$30,800.00 IN U.S. CURRENCY,

Defendant,

and

ERIK WHITE,

Claimant.

**STIPULATION TO EXTEND
TIME TO COMMENCE
JUDICIAL FORFEITURE
PROCEEDINGS**

The Plaintiff and the Claimant stipulate, pursuant to 18 U.S.C. § 983(a)(3)(A), to extend the time in which the Plaintiff is required to file a Complaint for Forfeiture or to obtain an Indictment alleging forfeiture by 90 days, up to and including May 30, 2023.

1. On or about September 6, 2022, the Minneapolis/St. Paul International Airport Police (“APD”) and members of the United States Drug Enforcement Administration (“DEA”) seized \$30,800.00 in U.S. Currency from the Claimant, Erik White.

2. The DEA commenced administrative forfeiture proceedings for the Defendant Currency and sent written notice to all known interested parties of its intent to forfeit the currency.

3. On November 28, 2022, Erik White filed a claim for the Defendant Currency through his attorney, Edward Johnson III.

4. The time has expired for any other person to file a claim for the Defendant Currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no other claims for any portion of the currency have been received from any other individual or entity.

5. Under 18 U.S.C. § 983(a)(3)(A), the government has 90 days after a claim has been filed in an administrative action to bring a civil complaint for forfeiture, “except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

6. The parties agree to extend the deadline under 18 U.S.C. § 983(a)(3) for filing a judicial forfeiture proceeding with respect to the Defendant Currency until May 30, 2023 to allow time for investigation and settlement discussions.

Dated: February 22, 2023

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Date: February 22, 2023

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